

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION**

OCT 27 2023

Clerk, U.S. District Court
District Of Montana
Great Falls

HERU SPENCER,

Plaintiff,

vs.

EXPERIAN; EQUIFAX INC;
RELX INC.; TRANSUNION
HOLDING COMPANY INC.;

Defendants.

Case No. 6:23-cv-00065-BMM-KLD

**ORDER ON
TRANS UNION, LLC'S
MOTION FOR ADMISSION OF
EMILY M. STULTZ, ESQ.
*PRO HAC VICE***

Your Honor,

I am Responding to the Motion to Dismiss, which I did not get until 10/20 and am responding as soon as possible, the mail has been having issues since covid and would ask the court for leniency, also as a Pro Se Plaintiff I would also ask some leniency in the future as I am not a lawyer. I will list my claims below.

Statement of facts

1. Trans Union, Equifax, Experian, and Lexis Nexis (RELX) are companies and not government agencies, yet have more power than Congress, the President, and other federal and state government agencies it would appear, as none of those agencies have the power to subvert or ignore the constitution and the Americans constitutional rights, yet these privately owned companies on a regular basis deprive the American people their constitutional right daily. Transunion, Equifax, Experian, Lexis Nexis have deprived me of my 1st amendment right religious freedom, freedom of speech and, my 14th amendment right to privacy, 4th amendment freedom of movement, using the credit reporting to limit my constitutional right usurping the constitution and superseding the federal and state government as a governing body over my constitutional right and the rights of the Americans. Is in violation of my

constitutional rights and in violation of 15 U.S. Code 1681b (a) (1) (2) and in violation of 15 U.S. Code § 1681 (a) (4) and in violation of my 14th amendment

2. Trans Union, Equifax, Experian, Lexis Nexis has used the Credit reporting to discriminate against Black peoples, Immigrants, LGBTQIA people, Women, low income People, people with disabilities, Certain religions that do not align with the religious beliefs of the companies owners and their political religious affiliation , The religion I started called the Djedi Order/Tree of Ashera/Out Proud, people of color, Palestinians and anyone affiliated with the blood of Canaan and the children of Ashera, and other protected classes. They have been deliberately and systemically discriminating from the day they were founded to prevent these groups from accessing financial access by limiting access utilizing the credit system to discriminate. I am a member several of these classes. and Trans Union, Equifax, Experian, Lexis Nexis, has used the credit reporting system to restrict and even prevent several of our constitutional rights and freedoms from being utilized by specific groups Trans Union, Equifax, Experian, Lexis Nexis wish to oppress and subjugate. Trans Union, Equifax, Experian, Lexis Nexis, lack of transparency to how they determine the credit scoring of certain individuals these groups shows a lack of accountability to the federal government, and a lack of accountability to the American people. Who is in charge these credit companies or the Federal Government? The federal Government, Congress, the Presidency and the se Honorable Courts have an obligation to protect the American citizens/ people's rights which has been violated countless times by Trans Union, Equifax, Experian, Lexis Nexis, and all the other credit reporting companies. In violation of 15 U.S. Code § 1681 (a) (4) fairness and right to privacy and violated 15 U.S. Code 1681b (a) (1) (2) and in violation of the constitution.

3. My individual constitutional right have been violated and subverted by Trans Union, Equifax, my consumer rights have been violated by Experian, Lexis Nexis. In violation of 15 U.S. Code 1681b (a) (1) (2) and in violation of 15 U.S. Code § 1681 (a) (4) and in violation of my 14th amendment.

4. The constitutional rights of Djedi Order/ Tree of Ashera/ Out Proud and the members of said church has been violated and subverted by Trans Union, Equifax, Experian, Lexis Nexis.

5. Trans Union, Equifax, Experian, Lexis Nexis has repeatedly falsely reported addresses names, phone numbers, bankruptcies and other information that I did not give them permission to make public which is in violation of the 14th amendment and right to privacy and 15 U.S. Code § 1681 (a) (4) fairness and right to privacy, and violated 15 U.S. Code 1681b (a) (1) (2) and violated 15 U.S. Code § 1681e (b) maximum accuracy.

6. Trans Union, Equifax, Experian, Lexis Nexis Falsely reported credit activity that was done by my stepfather Sidney Marvin Jackson when he stole my credit information and my social security number and falsely and fraudulently created credit accounts in my name, when I informed the credit companies. Trans Union, Equifax, Experian, Lexis Nexis, they did not remedy the damage that they had caused in violation of 15 U.S. Code § 1681e (a) and 15 U.S. Code § 1681 (a) (4) fairness and right to privacy and violated 15 U.S. Code 1681b (a) (1) (2).

7. I Heru Spencer have not given them the permission to make my information public in violation of 15 U.S. Code § 1681 (a) (4) and 15 U.S. Code § 1681 (a) (4) and 15 U.S. Code § 1681e (a) and my 14th amendment.

8. The privately owned companies, not government agencies Trans Union, Equifax, Experian, Lexis Nexis, have prevented me individually from getting a job, buying a house, renting, starting a business, my involvement in commerce, travel, freedom of movement, building a house for my place of worship and a place of worship for fellow church members, has prevented certain forms of employment, prevented many types of loans, prevented me from access of contracts with certain companies and prevented my right to contract, restricted my right to travel by limiting my ability to get insurance. Trans Union,

Equifax, Experian, Lexis Nexis has prevented or limited many of my consumer and constitutional rights by using the credit reporting which is not accurate and is not free of discrimination but rather laden with discrimination and deliberate false reporting, to restrict my freedoms.

For these and other reasons which may have not been stated I ask the court to deny the defendants request for dismissal and ask the court leniency on this late submission of my response. Thank you.

10/24/2023

WEC 1-308
HJ